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Rebuttal, Patent Application 10/800,789

The USPTO should receive a 10 page rebuttal (dated 20 Dec 05) and a copy of the drawing in this fax. Supporting documentation referenced in this rebuttal will be sent with a separate fax on this same date (20 Dec 2005). If errors in fax transmission occur the entire correspondence will be available to the USPTO in a few days. It will be sent via certified mail.

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DEC 20 2005

Mark Court
306 3rd Street
Wheatland, CA 95692

20 Dec 2005

In regards to: Patent Application 10/800,789

Director
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Subject: Rebuttal to Final Office Action Summary mailed on 16 Nov 05 (page 1 of 10)

Dear Sir or Ma'am,

It should be understood by all in the USPTO that disrespect is not the intention of this correspondence. My intention is to reply to the most recent Office Action Summary with the most accurate information possible in defense of my patent application and request for issuance of a patent. Please reference my last 6 page correspondence (dated 12 Oct 2005) as the contents of that letter is important to this response to the USPTO Final Office Action Summary mailed on 16 Nov 2005. In my last correspondence I requested review by the Director of the USPTO. I requested this review specifically because I wanted a third party review that was above and outside the purview of the examiner Mark Tsidulko, primary examiner John Ward and supervisor Sandra O'Shea. The response I received was my request was delegated to the SPE. John Ward signed the latest Office Action Summary and the examiner is once again listed as Mark Tsidulko. Therefore I did not receive the third party review that I requested. This is an important factor as I am requesting a review by the Director to verify fairness, correctness and legal accuracy of the examination procedures conducted on my patent application. Once again, as I present this latest rebuttal to the USPTO I request a review by the Director of the USPTO or the highest third party review authorized outside of Art Unit 2875 and above individuals listed above. After presenting my 6 page rebuttal in my last correspondence, I finally persuaded John Ward and Mark Tsidulko that the Claim Rejections in the first two Office Action Summaries were not valid. The reference cited in the Office Action Summaries was Lamparter, (US 5,604,480). In my 6 page document I provided strong evidence to disprove the statements documented in the Claim Rejections. In these previous two Office Action Summaries (before the most recent) the examiner attempted to back his Claim Rejections with a strategy of suggesting a previously described/patented invention with reference to Title 35 U.S.C. 102(b) and also attempted to document that the invention was obvious in view of the reference cited. My 6 page rebuttal successfully argued that the Claim Rejections were in fact not correct. In the latest Office Action Summary the examiner and primary examiner cite three new inventor references and move their strategy full focus to rejection under the following Title:

35 U.S.C. 103 Conditions for patentability; nonobvious

subject matter.

(a) A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, **if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.** Patentability shall not be negated by the manner in which the invention was made.

On the contrary I believe my patent claim is a patentable novelty :

35 U.S.C. 101 Inventions patentable.

Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefor, subject to the conditions and requirements of this title.

I absolutely object to the claim rejections based on Title 35 U.S.C. 103 (a) for factual evidence that is presented (as a whole) against the references cited. One very important issue must be clarified before proceeding. In the most recent Office Action Summary the examiner **acknowledged** in the Detailed Action Section that Claim 2 is at issue, but addressed the amendment "filed on 8/15/2005". The last amendment document for Claim 2 (Currently amended) was submitted with my rebuttal (letter dated 12 Oct 2005). This rebuttal and amendment document was faxed to the USPTO on 13 Oct 2005 and mailed to the USPTO on 14 Oct 2005. This amendment document corrected the Claim Objections listed in the last Office Action Summary mailed by the USPTO on 27 Sep 2005. Prior to this I had also submitted an amendment document that corrected the status identifiers identified in the Notice of Non-Compliant Amendment (mailed by the USPTO on 22 Aug 2005). This amendment document was faxed to the USPTO on 6 Sep 2005 along with a letter dated 5 Sep 2005. I have all correspondence on file for reference. I assume that an error with dates was made and that the acknowledgement documented applies to this most recent amendment document for Claim 2 (Currently amended). Before proceeding please reference Claim 2 (Currently amended) and read it entirely. This is important to fully understand my arguments below. One very important fact must be considered in combination with the arguments below. The claim for my invention documents physically arranging light elements into the shape of two cats sitting together to form one heart shape with their bodies, paws and tails. The light elements provide a pleasing visual effect by completely illuminating the two cats sitting together and the heart shape that is formed with their bodies, paws and tails. It is important to recognize

that the light elements for each cat forms **half** of the heart shape and combined together they form one heart shape. None of the **claims** for the references cited document what is documented in my claim. The **claims** of the references cited do not document physically arranging light elements in the shape of two cats that form one heart shape with their bodies, paws and tails. Therefore it is the responsibility of the examiner to prove his case of motivation to modify within the legal realms of the system. Reference 706.02(j)

Contents of a 35 U.S.C. 103 Rejection. The evidence that follows discloses several discrepancies in the examiner's Claim Rejections and errors in application examination procedures. The examiner states in his Claim Rejections "Claim 2 is rejected under 35 U.S.C. 103(a) as being unpatentable over Wainwright (US 6,651,365) in view of Leslie (US 2003/0145497) and Shieh (US 2005/0157485)." I have reviewed these patent applications as provided by the USPTO on the USPTO website. First for the record, of the three (3) references cited only Wainwright (US 6,651,365) has an issued patent. Shieh and Leslie have published applications. Second for the record, the publication date (21 Jul 2005) for Shieh is not older than one year prior to my application filing date (16 March 2004). The publication date for Shieh is after the filing date for my invention. Reference 35 U.S.C. 102(a),(b). Consider the following fallacies and discrepancies as the examiner attempted to use these three references in combination as evidence of obviousness and justification to modify and arrive at the claimed invention. The examiner documents in his Claim Rejections "Wainwright discloses (Fig. 3) a plurality of light elements that **are** form shape of a plurality of the animals (dolphins in this case), the light elements may obtain any desired color (col.4, lines 55-59; col.5, lines 24-27; col.8, lines 55-58). Wainwright discloses the instant claimed invention except for a shape of cats." I reviewed Wainwright's claims and in comparison to my claim I present the following. To achieve a **continuous animated motion** of two or more images Wainwright discloses in his claims that groups of optical fibers are mounted in "pre-determined arrays" under the control of "pre-programmed illumination sequences". It is a requirement to have the **pre-determined arrays** in combination with **pre-programming** to achieve the animated displays the inventor intended (envisioned) at the time of invention. Wainwright's claims do not document any specific type of displays such as dolphins. In his specification's "figures" he discloses an "animation of a jumping dolphin", a "bird in flight", a "swaying palm tree", "series of footprints", etc. Wainwright's specification does not disclose any form of a heart shape whatsoever. More specifically his application does **not** document using "pre-determined arrays" of fiber optics to achieve the ability to display two cats sitting together which form a heart shape with their bodies, paws and tails. By comparison my claim documents light elements physically arranged to display two cats sitting together forming one heart shape with their bodies, tails and paws. Therefore the statement "**Wainwright discloses the instant claimed invention except for a shape of cats.**" is not accurate and is misleading and therefore incorrect. The modification necessary to Wainwright's invention would be to arrange the optical fibers in a pre-determined array of two cats sitting together that form a heart shape with their bodies, paws and tails. A modification to the pre-programming would also be required to illuminate the pre-determined optical fibers. Wainwright or anyone experienced in the art would have to have had (at time of the

invention) the perception or have envisioned two cats sitting together forming one heart shape with their bodies, paws and tails to be motivated to make the modification. I argue that one experienced in the art must first envision or perceive what is documented in the claim for my invention before being motivated to make it or modify an existing invention. Had Wainwright envisioned this he would have included it in his "pre-determined arrays" and "pre-programmed illumination sequences". In fact he did not do this and did not document it in his claims. I therefore argue that the proposed modification is not obvious to one experienced in the art and the motivation to do so with this reference is not proven. Further, as documented in Wainwright's claims his invention's **primary purpose** is to display animation (motion) with the pre-determined and pre-programmed fiber optics. This is a **dynamic display**. By comparison my invention is a **static display**. To modify Wainwright's invention to display two cats sitting together which form a heart shape with their bodies, paws and tails in a **static display** (such as my invention operates) would mean a substantial change in principle of operation for Wainwright's invention. This modification would render the primary reference inoperable for its intended purpose. Reference MPEP 2143.01 V & MPEP 2145 III (last paragraph). Considering this evidence and the evidence that follows I declare my invention is a "new" patentable novelty when compared to Wainwright's claims and specification. It should be noted at this time that I am also experienced in the art. I disclosed my education and experience in electronics in my reply to the last Office Action and it is again included at the end of this correspondence. Further, the examiner documents in his Claim Rejections "Leslie discloses (Fig. 7) a display of patterns providing an symmetrical image of two cats sitting together. **Leslie discloses the instant claimed invention except for a shape of heart.**" Leslie discloses in his claims the ability to use a "computer" to display an "image and its enantiomorph" on a "computer screen". Leslie's claims do not disclose physically arranging light elements in the shape of two cats sitting together which form a heart shape with their bodies, paws and tails as it is so documented in the claim for my invention. In view of Leslie's claims, the modification required to achieve what is documented in my claim would change the **principle of operation** of Leslie's invention. That modification would be converting a computer and computer screen that displays figures into light elements that are physically arranged to illuminate figures. More specifically light elements that form two cats sitting together which form a heart shape with their bodies, paws and tails. This modification would render the reference inoperable for its intended purpose. Reference MPEP 2143.01 V & MPEP 2145 III (last paragraph). Further the reference for Leslie "teaches away" when combined and compared to Wainwright's invention. Compare the principle of operation of Leslie's invention documented in his claims (computer that displays images on a computer screen) and Wainwright's claims (pre-determined fiber optics illuminated by pre-programmed sequences). Illuminated visual effects from light elements are substantially different from visual effects produced on a computer screen. Teaching away also applies when combining the reference for Leslie with the reference for Shieh. Reference MPEP 2145 X.D.2. Therefore the reference for Leslie does not support Wainwright's reference and does not further support the examiner's projected motivation to make the modification necessary to arrive at the invention that is

documented in my claim. Further the statement **"Leslies discloses the instant claimed invention except for a shape of heart."** is misleading. If the "shape of a heart" was included along with Leslie's computer display of cats it would not equate to what is specifically documented in my claim which is light elements physically arranged in the shape of two cats sitting together which form one heart shape with their bodies, paws and tails. Again one experienced in the art would have to first envision or have the perception of what is documented in my claim. Then the computer would have to be programmed to display the entire form on the computer screen. Therefore the motivation to make this modification is not obvious. For these reasons the reference does not further support the primary reference. Further, the examiner documents in his Claim Rejections **"Shieh discloses a decorative lighting device and recites, that the ornament may be differently shaped animals or articles (page 1, [0004]), therefore accordingly, any desired shape, including cats and hearts, may be used in the device for decorative appearance, without changing the functionality of the device."** Once again this is a misleading and inaccurate statement. Shieh discloses in his claims a decorative lighting device with a "windmill" that can be displayed with a "specific design". The specific design is not specified in the claims. Animals and other shapes are not documented in Shieh's claims. The examiner's statement **"Shieh discloses a decorative lighting device and recites, that the ornament may be differently shaped animals or articles (page 1, [0004]),..."** is actually in fact a disclosure by Shieh of the prior art of Taiwan Patent Publication No. 220080. This is misleading as this prior art disclosure is not specific to Shieh's claims and therefore doesn't support the examiner's statement in the Claim Rejections. The Taiwan Patent Publication is not listed on the Notice of References Cited Form (PTO-892) as a reference. Even if it was listed this ornament device (as disclosed) is actually **two transparent hollow halves** with a Christmas light on the inside. Once again to modify this "ornament" to display light elements physically arranged in the shape of two cats sitting together which form one heart shape with their bodies, paws and tails would require a change in principle of operation of the ornament device itself. This would render the prior art (disclosed by Shieh) inoperable for its intended purpose and would not further substantiate the examiner's projection of motivation to modify to achieve my invention. Reference MPEP 2143.01 V & MPEP 2145 III (last paragraph). Therefore this prior art disclosed by Shieh loses its credibility to be combined with Wainwright's to justify motivation for modification to arrive at the claimed invention. In the section "Summary of the Invention" in Shieh's specification **"different animals"** are listed along with other scenery that can be displayed with the windmill. However, **"differently shaped animals"** are not listed. In view of the claims and specification for Shieh when combined with Wainwright's reference they do not further strengthen the examiner's projection that one experienced in the art would be motivated to make the modifications required to achieve what is documented in my claim. Wainwright discloses animals in his specification's figures therefore combining the reference for Shieh with Wainwright does not add any further credibility to the Claim Rejections as presented. One experienced in the art cannot conclude from Shieh's claims that there is motivation to make the modification of physically arranging light elements in the shape of two cats sitting together which form a heart shape with their bodies, paws and tails. One

experienced in the art must first envision or have a perception to make the modifications which would be difficult without the knowledge of the new teachings in my claim. Lastly, the examiner states in his Claim Rejections "It would have been obvious to one having ordinary skill in the art, at the time the invention was made, to provide the device of Wainwright having shape of combination of the cats and hearts, as taught by Leslie and Shieh, for the purpose of the decorative appearance." This statement has been substantially discredited and proven incorrect with the evidence provided above. Further, this statement is again misleading. The specifications for the references cited do not disclose producing any form of a heart shape. More importantly the ability to illuminate a "combination of cats and hearts" is one thing and physically arranging light elements to illuminate two cats sitting together which form one heart shape with their bodies, paws and tails is something substantially different. It is so different that I claim that my invention is a patentable novelty.

In summary of the Office Action Claim Rejections:

- 1) After reading the disclosure in the claim for my invention it is obvious to one experienced in the art that one would have to first gain a perception or envision (as I did) specifically what is disclosed in my claim before one would be motivated to make the modifications.
- 2) The references cited in fact do not teach or suggest all of the claim limitations of my invention. Reference MPEP 706.02(j).
- 3) The references cited alone or in combination do not explicitly nor implicitly (expressly or impliedly) suggest the claimed invention nor do they suggest motivation to modify. Reference MPEP 706.02(j).
- 4) Statements provided in the Claim Rejections are not factual.
- 5) The modifications required to the primary reference would require a change in the principle of operation of the device (modifying a dynamic display to a static display). The modification required would make the primary reference inoperable for its intended purposes. Reference MPEP 2143.01 V & 2145 III (last paragraph).
- 6) The modifications required to the secondary reference (Leslie) and to the prior art reference disclosed in the tertiary reference (Shieh) would require a change in the principle of operation of the devices. The modifications required would make these references inoperable for their intended purposes. Reference MPEP 2143.01 V & 2145 III (last paragraph). Therefore they do not support the primary reference as so stated in the Claim Rejections that the teachings can be combined to make the claimed invention.
- 7) Examiner does not fully comply with MPEP 706.02(j) Contents of a 35 U.S.C. 103 Rejection
- 8) Leslie's claims teach away when combined with the references for Wainwright and Shieh. Reference MPEP 2145 X.D.2.
- 9) The fallacies and discrepancies in the references cited substantially discredit the legality of the proposed modifications documented in the Claim Rejections. Therefore the references cited do not provide support to substantiate the examiner's statement that it would be obvious to make the proposed modifications. Subsequently the examiner's

skill is the only real factor left to justify the proposed modifications. Other than stating it is an obvious modification (in his eyes) no other convincing line of reasoning was documented that supports motivation to make the proposed modifications to arrive at the invention claimed. Reference MPEP 706.02(j). Skill alone cannot substantiate a conclusive argument for motivation of the proposed modifications. Lack of supportive references and lack of convincing line of reasoning makes the examiner's proposed modification debatable by others experienced in the art. It is debatable to me as a person skilled in the art. For example, minus supporting references it could be argued that the only factors used to justify the modifications proposed by the examiner is hindsight and the teachings disclosed in my claim. It could be argued that the examiner's thought process was guided by knowledge from my claim's teachings while documenting the Claim Rejections and that knowledge from my claim's teachings was the primary justification of suggesting the proposed modifications. Fallacies and discrepancies in the references disclosed place a high focus on the examiner's Claim Rejections that cannot be debated.

10) Due to the fallacies and discrepancies in the references cited and statements in the Claim Rejections it is important to note that other USPTO legal guidance (in favor of the applicant) may be applicable. Even though it is not documented in this rebuttal it must be recognized and abided by when this document is reviewed by those in the USPTO.

11) The examiner discloses in his Claim Rejections prior art not specific to Shieh's specification which makes the documented statement incorrect. The examiner cites details in his Claim Rejections that are extracted from other parts of the specifications of the references cited, but these details are not documented specifically in the claims themselves. This act of reading limitations from the specifications into the claims is a very important factor when considering my claim that my invention (specifically what is documented in my claim) is a "new" patentable novelty. The examiner has not proven a case otherwise with the references cited.

In view of all evidence presented in this rebuttal I respectfully request a reversal of the decision to make the latest Office Action Final. In consideration of **all arguments presented** as a whole against the references cited I respectfully request that the Director direct issuance of a patent for my invention. Rebuttal for other sections continues below.

In the Office Action Conclusion the examiner states, "Applicant's **amendment** necessitated the new ground(s) of rejection presented in this Office action." From my initial Claim submission to the present Claim 2 (Currently amended) only **minor** changes have been made to my claim. These minor changes were submitted to correct previous Office Action Claim Objections with minor changes in format and minor changes in choice of wording. From my very first claim I have claimed physically arranging light elements into the shape of two cats sitting together to form one heart shape with their bodies, tails and paws. This primary principle of operation has remained constant throughout all of the minor changes made to my claim. It is important to note that in the first Office Action Summary the examiner rejected my Claim under 35 U.S.C. 102(b) and stated in the end of the Claim Rejections "It would have been an obvious matter of

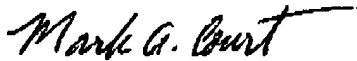
design choice to provide the different decorative shapes formed by the arrays of the LEDs for the purpose of an aesthetic appearance." I successfully rebutted these Claim Rejections. However this is the same basic argument in the new Claim Rejections. Therefore this was very weak grounds to introduce new Claim Rejections. This should be examined very thoroughly.

Drawings, Photos and Specification

The examiner states in the Office Action Drawings Section "The drawings are objected to because of description "@2004 Mark Court" below the figures..." It should be clear that I submitted one (1) drawing and the symbol below that drawing was a "©" symbol not an "@" symbol. I have a copy of what I submitted and included it with this correspondence. Either the examiner made a typographical error or the "©" symbol was not properly recognized by USPTO scanning equipment. The complete notice under the one drawing submitted was "©2004 Mark Court" not "@2004 Mark Court" as documented by the examiner. This copyright statement is in fact allowed to be placed with the drawing in the location where it is located. Included with this correspondence is the actual USPTO guiding documentation that I downloaded from the USPTO website and used as a guide to submit my utility application. **These are the rules that applied at the time I submitted my application.** Please reference the large brackets I placed around this USPTO guidance (included with this correspondence) that verifies my arguments in this section. The mailed copy of this correspondence will have large brackets with yellow highlighting. Please disregard all other markings and notes that I made at that time. Specifically Consolidated Patent Rules 1.84 (s) Copyright or Mask Work Notice (as provided by the USPTO to the public at time of application submission) states that the copyright notice is allowed as submitted on my drawing. As required, the authorization language for this copyright notice is in fact included at the beginning of my specification. Reference Consolidated Patent Rules 1.71(d),(e) included with this correspondence (as it was provided by the USPTO to the public at time of application submission). It is important to state at this time that my patent application drawing ^a not be posted on the USPTO website unless it displays the correct copyright notice as originally submitted. Further, the examiner documents in the Office Action Drawings Section "...and "Cat's heart shape night light Mark A. Court (530)633..." above the photos 2 and 3." Reference Consolidated Patent Rules 1.84 (b) Photographs included with this correspondence (as it was provided by the USPTO to the public at time of application submission). CPR 1.84 (b) does not provide any specific information on what can or cannot be displayed with photographs or how the information must be included with the photographs. In my review of the documentation available at the time of submission (Consolidated Patent Rules dated Oct. 1, 2003 and MPEP Rev. 1, Feb. 2003) I did not find any further specific guidance on information that can or cannot be included with photographs. Also, downloaded at the time of application submission was "A Guide to Filing A Non-Provisional (Utility) Patent Application" (my downloaded copy dated 2/2/2004). Reference the Section Drawing Requirements included with this correspondence that discusses photographs. This section does not provide any specifics

on what information can or cannot be included with the photographs or how it must be included nor is it found anywhere else in this guide. Reference **Consolidated Patent Rules 1.84 (c) Identification of drawings** included with this correspondence (as it was provided by the USPTO to the public at time of application submission). CPR 1.84(c) states that the inventor's name and title of invention may be included with the drawings. Reference **"A Guide to Filing A Non-Provisional (Utility) Patent Application Identification of Drawings"** included with this correspondence (as it was provided by the USPTO to the public at time of application submission). This section of this guide states that the inventor's name, title of invention **and phone number** may be included with the drawings. I included all of this information on the two (2) photographs that I submitted because the USPTO did not provide specific guidance covering what information could and could not be included with the photographs or how it must be included. Further, the examiner documents in the Office Action Drawings Section "Also, the descriptions "Photo 1 of 2" and "Photo 2 of 2" above the drawings must be changed to -Fig.2- and -Fig.3- respectively." It should be noted that the highlighted word "drawings" above should have been documented as "photos". The lack of specific guidance from the USPTO is the reasoning behind why I submitted the two (2) photographs this way. Therefore the photos should be excepted as they were submitted. However, if the examiner insists on this trivial matter I request that the examiner use white out and type -Fig.2- and -Fig.3- on white sticky paper and place on the photographs as required for scanning. An alternative method would be to use software available with scanners to crop the photographs and then place them in a new document with -Fig.2- and -Fig.3- included. I give the examiner permission to do this. If the examiner refuses to make these minor corrections the photos are not a requirement of the application submitted. However, as stated above the drawing was in fact submitted correctly and should be accepted (as it was when it was originally submitted). Further, the examiner documents in the Office Action Specification Section "The disclosure is objected to because of the following informalities: the description "@2004 Mark Court" must be taken out from the end of each paragraph of the specification. Appropriate correction is required." It should be clear once again that I submitted the "©" symbol i.e. "©Mark Court" not the "@" with my copyright statements in my application. Further, Reference **Consolidated Patent Rules 1.71(d),(e)** included with this correspondence (as it was provided by the USPTO to the public at time of application submission). CPR 171 (d),(e) specifically authorizes copyright notices within the patent application itself therefore these notices do not need to be removed as stated by the examiner. It is important to note that review of the USPTO website reveals that my specification was posted **without** my copyright notices. Further, the examiner documents in the Office Action Specification Section "Applicant is reminded of the proper content of a specification. The following guidelines illustrate the **preferred layout** for the specification of a utility application. These guidelines are suggested for the applicant's use." As a non-patent attorney, I thoroughly followed **"A Guide to Filing A Non-Provisional (Utility) Patent Application"** and **Consolidate Patent Rules 1.77 Arrangement of application elements** (copy included) that was available to the public by the USPTO at time of application submission. I submitted my application using this

guidance. At this point an important observation must be made. The two Office Action Summaries prior to the most recent one **did not** reject my application's Drawing, photos and Specification. Even if it is Standard Operating Procedure for the USPTO to inject new rejections into Office Actions **after several did not include these rejections** the USPTO should understand that I consider this a very unprofessional practice. Further once Claim Rejections for one Office Action Summary has been successfully rebutted (as I did) searching for new references and introducing new Claim Rejections at a later date (with weak grounds of reasoning) also seems to be a very unprofessional practice. Considering the complexity of the patent application process and time involved this is an injustice to the public submitting applications. I request a thorough review by the Director if any Office Action Summaries subsequent to this correspondence are documented with new Claim Rejections citing new references. I hereby submit this rebuttal with all due respect.



Mark A. Court
Patent Application 10/800,789
Inventor of the "Cats' Heart Shape Night Light"

Included with this correspondence: Copies of Consolidated Patent Rules (dated 1 Oct 2003), A Guide to Filing A Non-Provisional (Utility) Patent Application (my downloaded copy dated 2/2/2004), copy of drawing.

Electronic Qualifications

I was formally trained by the USAF as an electronics maintenance technician. The training included applying basic electronic theory, troubleshooting electronic circuits and specialized training to maintain a variety of computer and electronic communications systems. Combined with my military experience, I now have over 20 years of electronic experience maintaining computer and specialized communication systems. I have a degree in Electronic Systems Technology and hold industry certification as a Cisco Certified Network Associate (CCNA). Documented proof is available upon request.